

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ZAFTR INC. n/k/a SVELLA
FINANCIAL CORP.

Plaintiff,

v.

KEVIN JAMESON LAWRENCE,
ESQUIRE; BVFR & ASSOCIATES,
LLC; JOHN KIRK, ESQUIRE; and
KIRK LAW PLLC

Defendants.

CIVIL ACTION

NO. 21-CV-02177-WB

**PLAINTIFF’S MOTION FOR DIRECTED VERDICT
AGAINST DEFENDANT KIRK LAW AS TO COUNT I OF
THE COMPLAINT FOR BREACH OF THE FIRST ADDENDUM**

Plaintiff Zaftr Inc. (“Plaintiff” or “Zaftr”), by and through its undersigned counsel, hereby moves for a Directed Verdict Against Defendant Kirk Law PLLC (“Kirk Law”) as to Count I of the Complaint for Breach of the First Addendum. As set forth more fully in the accompanying Memorandum of Law, a directed verdict against Kirk Law as to Count I of the Complaint for breach of the First Addendum is warranted based upon the formal admissions contained within the Memorandum of Law of Defendants John Kirk, Esquire and Kirk Law PLLC in Support of Their Motion in Limine to Preclude Speculative Damages and Monies Already Recovered, filed last Friday, November 17, 2023. *See* Exhibit A, Speculative Damages Motion, ECF No. 90-1. Based upon those admissions, Zaftr is entitled to a directed verdict as to Count I of the Complaint for breach of the First Addendum against Kirk Law, in the amount of \$904,473.25.

WHEREFORE, Plaintiff respectfully requests that its Motion for a Directed Verdict Against Defendant Kirk Law as to Count I of the Complaint for Breach of the First Addendum be granted, and that a directed verdict be entered against Kirk Law, in the amount of \$904,473.25.

Respectfully submitted,

BLANK ROME LLP

Dated: November 20, 2023

By: /s/ Lewis W. Schlossberg
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